

Bea Covington  
Executive Director  
Missouri Coalition for the Environment  
6267 Delmar Boulevard  
St. Louis, MO 63130

APR 09 2002

TES

Site:	Herculaneum
ID#	MO0006266373
Break:	1-0
Other:	
4-9-02	

A 717

Dear Ms. Covington:

This is in response to your February 20, 2002, letter concerning the permanent relocation of residents of Herculaneum, Missouri. Your letter references that the U. S. Environmental Protection Agency (EPA) has offered temporary relocation to some residents in the community. Your letter also references that conducting a cleanup before identifying and fixing the source of the lead contamination is a waste of time and money, as well as posing a health hazard. You request that EPA take immediate steps to list this site on the National Priorities List (NPL) and provide permanent relocation for this community. You provided a copy of a letter signed by over 80 residents requesting permanent relocation.

Our highest priority remains the exposure of children to lead in Herculaneum. EPA along with the Missouri Department of Natural Resources (MDNR) have required Doe Run to undertake actions to address lead contamination. The approach being taken has two goals. One goal is to quickly remove historic lead contamination from yards, homes, and other areas where young children or others can come in contact with lead. The second goal is to quickly reduce the lead emissions from the smelter operations to prevent recontamination.

To address this first goal, EPA and MDNR have ordered Doe Run to implement an expedited program to remove contaminated soils, and clean the interiors at homes, play areas, and schools. To address the second goal, EPA and MDNR have required Doe Run to install additional air emission controls on their operation, as well as develop and implement a materials transportation plan to address lead releases which have been found to occur as a result of transporting materials through the town. In addition, we have developed a program to offer residents with young children the opportunity to be temporarily relocated. This is the temporary relocation mentioned in your letter. Such a temporary relocation will be offered until the actions to address the exposure of young children to contaminated soil and indoor dust are completed.

Past experiences have shown that removal of contaminated soil from homes, parks, and schools followed by removal of dusts from the interior of homes are effective ways of reducing the exposure of young children to lead. Although cleanups at residences are ongoing while the controls on the lead emissions are being installed, we believe that it is important to immediately take these steps rather than delay actions until the sources of the lead are controlled. In addition,

ARTD: APETRUSKA: cschmaltz: Disk 3: MO Coalition AX-0202612 Due 3/26/02

ARTD  
PETRUSKA

4/11/02  
19/11/02

CNSL  
COZAD

4/14/02  
PC

SUPR  
SANDERSON

4/14/02  
MIS

RA  
GUILLIFORD

4/11/02

40173288



SUPERFUND RECORDS

the offer of temporary relocation provides an added measure to reduce the exposure until the contaminated soil and indoor dust are completed.

By the end of April 2002, all homes within Herculaneum on the east side of Highway 61/67 where a child under 6 years of age resides will have had its soil replaced. The interior cleaning is to be completed shortly thereafter. (Note that residents who have refused to grant access to Doe Run may not meet this schedule.)

EPA and MDNR have been working closely with the Missouri Department of Health and Senior Services (MHSS), and the Agency for Toxic Substances and Disease Registry (ATSDR) to help ensure that the required actions will effectively protect public health. These agencies have done considerable work in the Herculaneum community to collect blood samples from residents as well as students in the Herculaneum schools. We will continue to work with these agencies to determine the risks posed by lead in the community.

Your February 20, 2002, letter questions whether or not "citizens are going to be periodically relocated over and over again over the next few years while EPA, MDNR, and Doe Run figure out if they've gotten it right." One area that the residents of Herculaneum have consistently pointed out as an area of concern is the potential for recontamination. EPA and MDNR have reviewed historic recontamination rates on previously cleaned yards and believe that these rates have been too high. EPA is in the early stages of implementing a recontamination monitoring plan that will measure the rates of recontamination. While we believe that soil replacement will be effective, we will monitor for recontamination. EPA will not allow Doe Run to recontaminate the residential yards in Herculaneum at a level that would trigger a cycle of continuous residential yard cleanups.

We will continue to evaluate the risks to the residents of Herculaneum as well as the required actions to be taken to address those risks. By working with MDNR, MHSS, and ATSDR we intend to take whatever actions are determined necessary to address the lead contamination in Herculaneum. If at any time we believe that the permanent relocation of residents is a necessary action to protect the residents of Herculaneum, especially young children, we will pursue that action.

Please note that any decision regarding permanent relocation will be based upon the effectiveness of the required actions to manage the risks posed by lead in the community. While approximately 80 residents have signed letters requesting permanent relocation, we have also received copies of several hundred letters from residents asking that this site not be listed on the NPL. This is a very complex, and emotional issue. Our decisions will be based upon sound evidence that permanent relocations are necessary to manage the risks.

Although EPA has not determined that the permanent relocation of residents is necessary, an agreement was recently reached between the state of Missouri and Doe Run that calls for Doe Run to buy-out homes, on a voluntary basis, that are located in close proximity to the smelter.

While not directly a party to this agreement, EPA welcomes it as it provides additional and immediate protection of the health of the young children who are at greatest risk due to the location of their home. At the same time, this agreement does not alter any of Doe Run's commitments in existing orders with the agency.

We appreciate your interest in this most important issue. If you have any questions, please contact Tony Petruska of my staff at 913-551-7637.

Sincerely,

James B. Gulliford  
Regional Administrator

cc: Dave Mosby  
MDNR  
Denise Jordan-Izaguirre  
ATSDR  
Gale Carlson  
MHSS



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

APR 09 2002

Bea Covington  
Executive Director  
Missouri Coalition for the Environment  
6267 Delmar Boulevard  
St. Louis, MO 63130

OFFICE OF  
THE REGIONAL ADMINISTRATOR

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Sincerely,

A handwritten signature in black ink, appearing to read "J. B. Gulliford", with a stylized flourish at the end.

James B. Gulliford  
Regional Administrator

cc: Dave Mosby  
MDNR  
Denise Jordan-Izaguirre  
ATSDR  
Gale Carlson  
MHSS